

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Case No. 2:24-mj-526

Robert Elwood MATTHEWS*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 09/19/2024 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

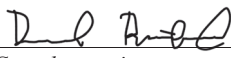
21 U.S.C. §§ 841

Offense Description

Possession with the Intent to Distribute A Mixture or Substance Containing a Detectable
Amount of Methamphetamine, a Schedule II Controlled Substance

This criminal complaint is based on these facts:
See attached Affidavit, which is fully incorporated herein.

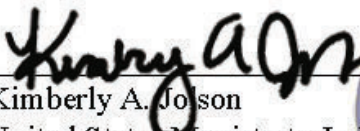
☒ Continued on the attached sheet.


Complainant's signature

DEA Special Agent Daniel Rutherford
Printed name and title

Sworn to before me and signed in my presence.

Date: November 4, 2024City and state: Columbus, Ohio


Kimberly A. Tolson
United States Magistrate Judge



AFFIDAVIT

I, Daniel Rutherford, being duly sworn, depose and state the following:

INTRODUCTION

1. I am a Special Agent with the Drug Enforcement Administration (DEA), and have been since November of 2023. As such, I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516. I am empowered to investigate, to make arrests with or without warrants and to execute search warrants under the authority of 21 U.S.C. § 878. I hold a Bachelor’s Degree in Aeronautics from Embry-Riddle Aeronautical University. I have undergone the following training:

a. I have completed the DEA Basic Agent Training Academy, which is a 17-week course in Quantico, VA that included (but was not limited to) training in the following areas: surveillance, undercover operations, report writing, confidential source management, drug identification, legal principles, search warrant operations, case initiation and development, interview and interrogation, defensive tactics, physical training, and firearms proficiency. I continue to receive training on a daily basis by conducting criminal drug investigations and drawing from the expertise of agents more experienced than myself.

b. Additionally, as a DEA Special Agent, my experience includes participating in criminal arrests, conducting physical surveillance, trash seizures, searching for evidence during court-authorized search warrants, and authoring search warrants as well as subpoenas.

PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of an application for a federal arrest warrant and criminal complaint against Robert Elwood **MATTHEWS** (“**MATTHEWS**”) for a violation of Title 21, United States Code, Section 841, Possession with the Intent to Distribute a Mixture or Substance Containing a Detectable Amount of Methamphetamine, a Schedule II Controlled Substance.

3. My knowledge of this investigation is based upon my own personal observations, as well as the observations and investigations conducted by other law enforcement officers and investigators concerning the facts and circumstances involved in the subject investigation. I have not included in this Affidavit all the facts known to me, but only that information sufficient to establish probable cause to believe he committed the above offense.

SUMMARY OF PROBABLE CAUSE

4. In June 2024, members of the DEA Columbus District Office began an investigation into the Sir Jeffrey CARROLL (“CARROLL”) Drug Trafficking Organization (“DTO”) operating in the Southern District of Ohio.

5. On September 19, 2024, investigators received a call from a detective with the Chillicothe Police Department (“CPD”). The Detective relayed that CPD received information that two individuals, Robert MATTHEWS and an individual identified for purposes of this affidavit as “L.A.”, were traveling to the Hollywood Casino in Columbus, Ohio to purchase crystal-methamphetamine from their source of supply. He further stated that the individuals were traveling in a 2013 green Kia Soul bearing Ohio license plate KCX4983. As a result of this information, CPD and the Ohio

State Highway Patrol (OSHP) were conducting continuous surveillance on the Kia vehicle. DEA investigators recognized the green Kia Soul as the same vehicle they observed Sir Jeffrey CARROLL meet with on July 30, 2024, and appeared to conduct a hand-to-hand drug transaction in Chillicothe, Ohio. Upon receiving this information, the DEA Columbus office checked the current location of one of CARROLL's vehicles on which they had a tracking device which had been authorized by Franklin County Municipal Court, specifically, a 2012 white Audi bearing Ohio license plate JYZ2247. Investigators noted the Audi was traveling towards the Hollywood Casino.

6. At approximately 2:20 p.m., a Detective from CPD observed the green Kia Soul turn in to a Circle K gas station located at 411 Georgesville Road in Columbus and park at the gas pumps. Officers identified L.A. as the driver and MATTHEWS as the front passenger.

7. At approximately 2:40 p.m., investigators observed the white Audi turn North on Georgesville Road and then turn into the Circle K gas station located at 411 Georgesville Road, and park directly beside the green Kia Soul. CPD Detectives then observed MATTHEWS exit the front passenger seat of the green Kia Soul and enter into the front passenger seat of CARROLL's white Audi. After a few moments, MATTHEWS was observed exiting the front passenger seat of the white Audi carrying a black bag and placing it in the rear passenger side of the green Kia Soul and entering back into the front passenger seat of the green Kia Soul. Shortly after the exchange, both vehicles departed in separate directions. Surveillance was maintained on the green Kia Soul driven by L.A. with MATTHEWS in the front passenger seat.

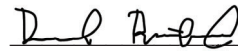
8. As surveillance continued, investigators observed the green Kia Soul travel on US 270 East toward US 23 South. The Kia Soul eventually stopped at the Certified Gas Station, located at 5991 S. High Street in Columbus. MATTHEWS and L.A. were observed exiting the vehicle and entering into the gas station holding hands. After several minutes, MATTHEWS and L.A. exited the gas station carrying miscellaneous food items and MATTHEWS entered into the driver seat and L.A. entered into the front passenger seat. The green Kia Soul departed the area where surveillance was maintained.

9. The vehicle traveled southbound on US 23. The vehicle was observed by OSHP Troopers making several traffic violations while on US 23, and CPD Detectives also advised Troopers that MATTHEWS had a suspended driver's license which was confirmed through the Ohio Law Enforcement Gateway. OSHP Troopers were able to conduct a traffic stop on the vehicle at US 23 near Rubi Lane in Pickaway County. During the traffic stop, a Pickaway County Sheriff's Office certified K9 was deployed to conduct a free-air sniff of the vehicle for the presence of drugs which yielded a positive result. During a probable cause search of the vehicle, officers recovered approximately 270 gross grams of suspected crystal-methamphetamine and drug paraphernalia. The suspected methamphetamine was located in a grocery bag concealed in what appeared to be a bag of trash. The evidence was secured by Troopers who then released the evidence to the DEA for the pending investigation in reference to CARROLL. DEA investigators conducted a field test on the suspected crystal-methamphetamine which yielded a positive result for the presence of methamphetamine. MATTHEWS and L.A. were not interviewed and were released without further incident. The suspected methamphetamine has been submitted for laboratory analysis by the DEA.

10. Based on my experience and training, I am aware that 270 gross grams of methamphetamine is a distribution quantity.

CONCLUSION

11. Based on the facts set forth in this Affidavit, there is probable cause to believe that on September 19, 2024, in the Southern District of Ohio, Robert Elwood MATTHEWS did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code § 841(a)(1) and (b)(1)(C).



Daniel Rutherford
Special Agent
Drug Enforcement Administration

Subscribed and sworn to before me
this ____ day of November 2024.



Kimberly A. Johnson
United States Magistrate Judge

